

EXHIBIT 44

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION
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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga v. Purdue Pharma, et  
al., Case No. 17-OP-45004

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al., Case No. 18-OP-45132  
The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of
MATTHEW PAOLINO
December 5, 2018
9:02 a.m.

Taken at:
Akron Bar Association
57 South Broadway Street
Akron, Ohio

Stephen J. DeBacco, RPR

1 Q. When you started in 2012, what were
2 the -- was it different in terms of the most
3 popular or the most activity in terms of types
4 of drugs?

5 A. It was the -- cocaine has always
6 been popular. It was the one-pot meth labs,
7 the home methamphetamine cooks.

8 Q. So less now of the one-pot labs --
9 and forgive me if you told us this earlier --
10 and more of crystal meth?

11 A. That's correct.

12 Q. All right. And more fentanyl now
13 than there used to be.

14 A. That's correct.

15 Q. What is fentanyl?

16 A. Synthetic opioid.

17 Q. Where does it come from?

18 MR. LEDLIE: Object to the form.
19 You can answer.

20 A. I know where some comes from.

21 Q. What -- where?

22 A. I know they manufacture it in labs
23 in China, illicit labs in Mexico. I don't know
24 where it all comes from. I wish I did.

25 Q. And the crystal meth, where is --

1 people are indicted.

2 Q. So fent- -- fentanyl -- we can
3 agree fentanyl is an illegal narcotic?

4 MR. LEDLIE: Object to the form.

5 A. Well, I believe there are legal --
6 it can be prescribed.

7 Q. Okay.

8 A. If -- if that's what you're asking.

9 Q. Let me try to rephrase the
10 question. The type of fentanyl activity that
11 you're trying to identify and stop in Summit
12 County, that's --

13 A. Illicit?

14 Q. -- illegal, non-prescription
15 fentanyl; is that right?

16 A. Sure.

17 Q. Okay. And -- and crystal meth is
18 not a prescription medication?

19 A. No.

20 Q. All right. Would you agree that
21 heroin represents the greatest drug threat
22 today to Summit County?

23 A. Heroin?

24 Q. Yes.

25 A. I think it's one of them.

1 Q. What else would you include in
2 that?

3 A. I would include fentanyl and
4 cocaine and crystal methamphetamine.

5 Q. Okay. And is it -- is it the
6 case -- I think I read somewhere that it's the
7 case that sometimes the heroin is laced with
8 the fentanyl?

9 A. That's correct.

10 Q. All right. How about the greatest
11 threats for -- drug threats related to violent
12 crime in Summit County? What are -- what would
13 those be? The same ones?

14 A. Yes. You could throw marijuana in
15 there, too.

16 Q. Okay. And how about the greatest
17 risk for property crimes? The same ones?

18 MR. LEDLIE: Object to the form.

19 A. I really don't know. I mean, I
20 would say there's violence in -- and theft
21 in -- related to all these drugs.

22 Q. Has -- does the drug unit have a --
23 drug unit have any -- do you have a K9 unit?

24 A. We do.

25 Q. Is that part of the Summit County